



### **Confidential Reporting of Wrongdoing**

The College is committed to the highest ethical standards and conducting its operations in compliance with federal and state laws and regulations.

This Policy encourages College Employees, Students, vendors, and other members of the College community to disclose allegations of wrongdoing concerning the College. Wrongdoing may include, but is not limited to:

- Crimes or violations of the law or state or federal regulations;
- Fraud or financial irregularity;
- Improper use of College funds, property or assets;
- Corruption, bribery or blackmail;
- Endangering the health or safety of an individual;
- Harming College property;
- Abuse or harassment of Students, Employees, patrons, College guests, or visitors;
- Engaging in activity in violation of Policy, Administrative Procedures or other College rules and regulations;
- Other unethical conduct.

### **Methods Of Reporting.**

**Internal Reporting.** The Board designates the Internal Auditor (or, if such position is vacant, an Administrator so designated by the President) to receive complaints and reports of wrongdoing at the College (the “Responsible Official”).

The College acknowledges that circumstances may warrant the making of a complaint or a report to a College official other than and/or in addition to the Responsible Official:

- If the reporter believes that the Responsible Official and/or his immediate staff may possess a conflict of interest, the reporter may instead submit a report to the President and/or the College’s General Counsel.
- Where the complaint involves the Responsible Official or his/her immediate staff, the reporter may instead submit the complaint to the President and/or the General Counsel.

- Where the complaint involves the President, Treasurer, College Controller, General Counsel, or other Administrator, the reporter may instead submit a report to the Chairman, the President, and/or the General Counsel.
- Where the complaint involves the President, Treasurer, Controller, or General Counsel, the Responsible Official (or President or General Counsel, if such individuals received the report instead of the Responsible Official) shall notify the Chairman immediately upon receipt of the same.
- Where the complaint involves a Trustee, the Responsible Official shall notify the President, the General Counsel, and the Chairman (or, in the event of a complaint regarding the Chairman, the Vice-Chairman) upon receipt of the same.

**Anonymous Reporting.** A mechanism for confidential anonymous reporting of perceived wrongdoing, using an external, independent party, is provided both via telephone and the internet, and via other channels, as appropriate. The President shall ensure the College's website includes a link for College Employees, Students and members of the public, to confidentially report wrongdoing to the Responsible Official, President and the Board.

**Reporting to Government and Law Enforcement Agencies.** Where an Employee or contractor has reasonable cause to believe that conduct violates a state or federal rule, law, or regulation, nothing in this Policy shall be construed as precluding the Employee from directly disclosing such information to a government or law enforcement agency.

**Records of Complaints.** For all complaints submitted to the Responsible Official, the Responsible Official will maintain a record of raised concerns and related outcomes. For all other complaints, the President, Chairman and/or General Counsel (as applicable) shall maintain a record of raised concerns and related outcomes. At a minimum, the Responsible Official will provide the Board with a quarterly update of all such complaints received and actions taken, although the Board may ask for reports at any time.

**Retaliation Prohibited.** The College will not tolerate any harassment of reporters. The College will take all appropriate actions to protect reporters who raise concerns or disclose information regarding wrongdoing in good faith.

**Disclosure of Wrongdoer's Identity.** An alleged wrongdoer's name may be disclosed only upon completion of the investigation and if found guilty. If wrongdoer is found guilty, appropriate legal and/or personnel action will be taken.

The Responsible Official, in consultation with the President and General Counsel, shall have authority to develop and implement Administrative Procedures and reporting mechanisms and processes consistent with this Policy. If substantial changes are made to Administrative Procedures implementing this Policy, the Board will be notified.

Authority: 5 ILCS 430/Art. 15; 740 ILCS 174/.

History:

- Adopted 3/19/09
- Reviewed 4/4/16
- Amended 5/19/16
- Amended 1/21/21